

## REMARKS

Applicants appreciate the examination of the present application as evidenced by the final Office Action dated July 25, 2008 (hereinafter, the "Final Action"). Claims 1 and 4-69 are pending in the present application. Claims 7-10 and 16-69 have been withdrawn from consideration, and Claims 1, 4-6 and 11-15 stand rejected. Applicants respectfully submit that the claims of the pending application are patentable for at least the reasons set forth below.

### **Claims 1, 4-6 and 11-15 Comply with 35 U.S.C. §112, Second Paragraph**

Claims 1, 4-6 and 11-15 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. *See* Final Action, page 2. Applicants have amended Claim 1 to clarify the methods of forming a metal oxide thin dielectric film. Thus, Applicants believe this rejection is now overcome and respectfully request that this rejection be withdrawn. In the event that the Examiner has any unresolved issues regarding the clarity of the pending claims, consistent with the provisions of the Manual of Patent Examining Procedure (MPEP) § 2173.02, Applicants respectfully request the Examiner to suggest appropriate claim language to Applicants.

### **Claims 1, 4-6 and 11-15 are not Obvious in View of Lim et al. and Li et al.**

Claims 1, 4-6 and 11-15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0040196 to Lim et al. ("Lim") in view of U.S. Patent Application No. 2005/0151210 to Li et al. ("Li"). *See* Final Action, page 3. Applicants respectfully disagree.

For at least the reasons previously made of record, Applicants respectfully submit that Lim does not teach or suggest the methods recited in the pending claims, and the deficiency of Lim is not cured by Li. Moreover, Applicants maintain that the combination of Lim and Li is inappropriate for the reasons previously set forth and because Li is not prior art. More specifically, pursuant to 37 C.F.R. §1.55, a translation of Korean Application No. 2003-25533, filed April 22, 2003, is submitted herewith along with a Certificate of Translation (Statement of Accuracy of Translation). Please note that this claim of priority has been

perfected to advance prosecution of this application to allowance and should not be construed as an admission with respect to any teachings of Li.

Accordingly, Applicants respectfully request that the rejection of Claims 1, 4-6 and 11-15 under 35 U.S.C. §103(a) be withdrawn.

### CONCLUSION

Applicants respectfully request reconsideration of all pending claims in view of the foregoing. At least based upon the foregoing, Applicants submit that the present application is in condition for allowance and the same is earnestly solicited. The Examiner is encouraged to telephone the undersigned at 919-854-1400 for resolution of any outstanding issues.

Respectfully submitted,

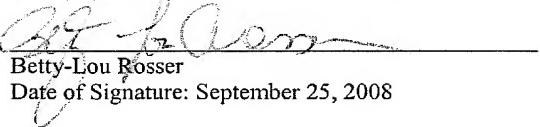


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Betty-Lou Rosser  
Date of Signature: September 25, 2008